

1 [Parties and Counsel Listed on Signature Pages]
2
3
4
5
6
7
8
9
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11
12
13
14
15
16
17
18
19
20
21
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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR (PHK)

**JOINT STIPULATION AND [PROPOSED]
ORDER TO MODIFY PRETRIAL
SCHEDULE**

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, and through their undersigned counsel,
 2 Meta, TikTok, Snap, and YouTube (“Defendants”); the MDL Personal Injury and School District
 3 (“PI/SD”) Plaintiffs; and the MDL State Attorneys General (“State AGs”) (collectively, the “Parties”)
 4 hereby agree to the following negotiated amendment of the Pretrial Schedule entered by the Court in
 5 CMO No. 18 (ECF 1290), *as modified* in ECF 2147 and CMO No. 26 (ECF 2208).

6 WHEREAS, in CMO No. 26, the Court set briefing schedules and page limits on (1) motions for
 7 summary judgment in the School District Bellwether Cases and (2) Rule 702 motions on General
 8 Causation experts and School District experts, and reset the hearing on those motions from January 9,
 9 2025 to January 26, 2026. ECF 2208.¹

10 WHEREAS, the Court ruled that “[a]ny remaining motions, including motions specific to the
 11 personal injury plaintiffs, if appropriate, shall be decided in the next phase of this litigation.” *Id.*

12 WHEREAS, in light of these scheduling orders, and pursuant to the Court’s guidance at the
 13 August 22, 2025 Case Management Conference, Plaintiffs and Defendants have met and conferred about
 14 the timing of witness lists and jury instructions, as well as certain other case management deadlines.

15 WHEREAS, the Parties agree, subject to Court approval, that it will benefit all sides’ trial
 16 readiness, particularly in light of the significant briefing deadlines occurring throughout this fall, to
 17 make minor adjustments to these deadlines.

18 NOW, THEREFORE, the Parties hereby jointly stipulate and request that the Court approve the
 19 following proposed amended pretrial schedule:

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 27 ¹ The briefing schedule for motions for summary judgment on the State AGs’ claims and Rule 702
 motions on four AG-specific experts is set forth in ECF 1955, 2139, and 2251.

Event	Current Deadline	Proposed Deadline
Exchange Preliminary Witness Lists ²	September 10, 2025	September 24, 2025
Dispositive and Rule 702 (<i>Daubert</i>) Motions: Opening Briefs ³	September 24, 2025 ⁴	September 30, 2025 ⁵
Deadline to Meet and Confer Regarding Whether Any Additional and Unanticipated Discovery May Be Needed on Disclosed Witnesses and to Develop a Plan for Completing Any Agreed-Upon Additional Discovery	September 22, 2025	October 6, 2025
Submit Joint Status Report on Results of Meet and Confer on Additional and Unanticipated Discovery on Disclosed Witnesses	September 24, 2025	October 8, 2025
Submit Joint Letter Brief on Any Remaining Discovery Disputes on Disclosed Witnesses	September 29, 2025	October 13, 2025
Exchange Preliminary Proposed Jury Instructions ⁶	September 22, 2025	October 20, 2025
October Case Management Conference	October 24, 2025 9:00am	October 24, 2025 9:00am
Dispositive and Rule 702 (<i>Daubert</i>) Motions: Opposition Briefs	October 27, 2025	November 7, 2025
November Case Management Conference	November 19, 2025 2:00pm	November 19, 2025 2:00pm

² The parties have agreed and ask the Court to so-order that this deadline (i) shall apply only to witnesses to be called live at trial (as opposed to witnesses who will testify via prerecorded deposition testimony, who will be identified during the designation process); (ii) shall apply to the school district but not the personal injury bellwether cases, with witnesses for the personal injury cases to be identified at a later date; (iii) for the State AG cases, will apply to Meta witnesses only, with the exchange of State Witnesses to be deferred, as set forth more specifically in ECF 2249.

³ All dispositive and *Daubert* motion deadlines in this chart apply only to the briefs that the Court has permitted pursuant to CMO No. 26.

⁴ Subject to exceptions for certain experts deposed on or after September 11, 2025. *See* ECF 2147.

⁵ The State AGs and Meta have agreed and ask the Court to so-order that Meta may file a separate Rule 702 motion of no more than 10 pages on October 3, 2025, as to AG-only expert Dr. Prinstein, as he is unable to be deposed on the date the parties previously scheduled due to recently scheduled congressional testimony.

⁶ The parties ask the Court to so-order that this deadline shall apply only to the school district bellwether cases (with jury instructions for the personal injury cases to be exchanged at a later date, after the Court has set deadlines for motions for summary judgment in those cases). The jury instruction deadlines in this chart (originally from CMO No. 18) are not applicable to the State AG claims. *See* ECF 2208 (setting October 10 deadline to submit AG jury instructions).

1 Dispositive and Rule 702 (<i>Daubert</i>) Motions: 2 Reply Briefs	November 25, 2025	December 5, 2025
3 File Proposed/Disputed Jury Instructions and 4 Additional Questions for Juror's Survey Monkey Questionnaire	October 27, 2025	December 8, 2025
5 December Case Management Conference	December 15, 2025 9:00am (Zoom)	December 15, 2025 9:00am (Zoom)

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7 **IT IS SO STIPULATED**, through Counsel of Record.

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9 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

10 Dated: _____

11 Honorable Yvonne Gonzalez Rogers
12 United States District Judge

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14
15 Respectfully submitted,

16 DATED: September 12, 2025

17 By: /s/ Lexi J. Hazam
18 LEXI J. HAZAM
19 **LIEFF CABRASER HEIMANN &**
20 **BERNSTEIN, LLP**
21 275 BATTERY STREET, 29TH FLOOR
22 SAN FRANCISCO, CA 94111-3339
23 Telephone: 415-956-1000
24 lhazam@lchb.com

25 PREVIN WARREN
26 **MOTLEY RICE LLC**
27 401 9th Street NW Suite 630
28 Washington DC 20004
Telephone: 202-386-9610
pwarren@motleyrice.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER

SEEGER WEISS, LLP
55 CHALLENGER ROAD, 6TH FLOOR
RIDGEFIELD PARK, NJ 07660
Telephone: 973-639-9100
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel and Settlement Counsel

JENNIE LEE ANDERSON
ANDRUS ANDERSON, LLP
155 MONTGOMERY STREET, SUITE 900
SAN FRANCISCO, CA 94104
Telephone: 415-986-1400
jennie@andrusanderson.com

Liaison Counsel and Ombudsperson

**MATTHEW BERGMAN
SOCIAL MEDIA VICTIMS LAW CENTER
821 SECOND AVENUE, SUITE 2100
SEATTLE, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org**

JAMES J. BILSBORROW
WEITZ & LUXENBERG, PC
700 BROADWAY
NEW YORK, NY 10003
Telephone: 212-558-5500
jbilsborrow@weitzlux.com

ELLYN HURD
SIMMONS HANLY CONROY, LLC
112 MADISON AVE, 7TH FLOOR
NEW YORK, NY 10016
Telephone: 212-257-8482
ehurd@simmonsfirm.com

ANDRE MURA
GIBBS MURA, A LAW GROUP
1111 BROADWAY, SUITE 2100
OAKLAND, CA 94607
Telephone: 510-350-9717
amm@classlawgroup.com

1 MICHAEL M. WEINKOWITZ
2 **LEVIN SEDRAN & BERMAN, LLP**
3 510 WALNUT STREET
4 SUITE 500
5 PHILADELPHIA, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

6 MELISSA YEATES
7 **KESSLER TOPAZ MELTZER & CHECK LLP**
8 280 KING OF PRUSSIA ROAD
RADNOR, PA 19087
Telephone: 610-667-7706
myeates@ktmc.com

9
10 Plaintiffs' Steering Committee Leadership

11 RON AUSTIN
12 **RON AUSTIN LAW**
13 400 MANHATTAN BLVD.
HARVEY, LA 70058
Telephone: 504-227-8100
raustin@ronaustinlaw.com

14
15 AELISH M. BAIG
16 **ROBBINS GELLER RUDMAN & DOWD LLP**
17 1 MONTGOMERY STREET, #1800
SAN FRANCISCO, CA 94104
Telephone: 415-288-4545
AelishB@rgrd.com

18
19 PAIGE BOLDT
20 **ANAPOL WEISS**
21 130 N. 18TH STREET, #1600
PHILADELPHIA, PA 19103
Telephone: 215-929-8822
pboldt@anapolweiss.com

22
23 THOMAS P. CARTMELL
24 **WAGSTAFF & CARTMELL LLP**
25 4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: 816-701-1100
tcartmell@wcllp.com

26
27 FELICIA CRAICK

KELLER ROHRBACK LLP
1201 THIRD AVENUE, SUITE 3400
SEATTLE, WA 98101
Telephone: 206-623-1900
fcrack@kellerrohrback.com

SARAH EMERY
HENDY JOHNSON VAUGHN EMERY PSC
600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KT 40202
Telephone: 859-600-6725
semery@justicestartshere.com

KIRK GOZA
GOZA HONNOLD
9500 NALL AVE. #400
OVERLAND PARK, KS 66207
Telephone: 913-412-2964
Kgoza @gohonlaw.com

RONALD E. JOHNSON, JR.
HENDY JOHNSON VAUGHN EMERY PSC
600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KT 40202
Telephone: 859-578-4444
rjohnson@justicestartshere.com

MATTHEW P. LEGG
BROCKSTEDT MANDALAS FEDERICO, LLC
2850 QUARRY LAKE DRIVE, SUITE 220
BALTIMORE, MD 21209
Telephone: 410-421-7777
mlegg@lawbmf.com

SIN-TING MARY LIU
**AYLSTOCK WITKIN KREIS &
OVERHOLTZ, PLLC**
17 EAST MAIN STREET, SUITE 200
PENSACOLA, FL 32502
Telephone: 510-698-9566
mliu@awkolaw.com

1
2 JAMES MARSH
3 **MARSH LAW FIRM PLLC**
4 31 HUDSON YARDS, 11TH FLOOR
5 NEW YORK, NY 10001-2170
6 Telephone: 212-372-3030
7 jamesmarsh@marshlaw.com
8
9

10 JOSEPH H. MELTER
11 **KESSLER TOPAZ MELTZER & CHECK LLP**
12 280 KING OF PRUSSIA ROAD
13 RADNOR, PA 19087
14 Telephone: 610-667-7706
15 jmeltzer@ktmc.com
16
17

18 HILLARY NAPPI
19 **HACH & ROSE LLP**
20 112 Madison Avenue, 10th Floor
21 New York, New York 10016
22 Telephone: 212-213-8311
23 hnappi@hrsclaw.com
24
25

26 EMMIE PAULOS
27 **LEVIN PAPANTONIO RAFFERTY**
28 316 SOUTH BAYLEN STREET, SUITE 600
PENSACOLA, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com
29
30

31 RUTH THI RIZKALLA
32 **THE CARLSON LAW FIRM, PC**
33 1500 ROSECRANS AVE., STE. 500
34 MANHATTAN BEACH, CA 90266
35 Telephone: 415-308-1915
36 rrizkalla@carlsonattorneys.com
37
38

39 ROLAND TELLIS
40 DAVID FERNANDES
41 **BARON & BUDD, P.C.**
42 15910 Ventura Boulevard, Suite 1600
43 Encino, CA 91436
44 Telephone: 818-839-2333
45 rtellis@baronbudd.com
46 dfernandes@baronbudd.com
47
48

1 DIANDRA "FU" DEBROSSE ZIMMERMANN
2 **DICELLO LEVITT**
3 505 20th St North
4 Suite 1500
5 Birmingham, Alabama 35203
6 Telephone: 205-855-5700
7 fu@dicelollevitt.com

8 Plaintiffs' Steering Committee Membership

9 JOSEPH VANZANDT
10 **BEASLEY ALLEN**
11 234 COMMERCE STREET
12 MONTGOMERY, LA 36103
13 Telephone: 334-269-2343
14 joseph.vanzandt@beasleyallen.com

15 Federal/State Liaison

16 *Attorneys for Individual Plaintiffs*

ROB BONTA
Attorney General
State of California

/s/ Joshua Olszewski-Jubelirer
Nicklas A. Akers (CA SBN 211222)
Senior Assistant Attorney General
Bernard Eskandari (SBN 244395)
Emily Kalanithi (SBN 256972)
Supervising Deputy Attorneys General
Nayha Arora (CA SBN 350467)
David Beglin (CA SBN 356401)
Megan O'Neill (CA SBN 343535)
Joshua Olszewski-Jubelirer (CA SBN 336428)
Marissa Roy (CA SBN 318773)
Brendan Ruddy (CA SBN 297896)
Deputy Attorneys General
California Department of Justice
Office of the Attorney General
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004
Phone: (415) 510-4400
Fax: (415) 703-5480
Joshua.OlszewskiJubelirer@doj.ca.gov

Attorneys for Plaintiff the People of the State of California

1 **PHILIP J. WEISER**
2 Attorney General
3 State of Colorado
4 /s/ Krista Batchelder
5 Krista Batchelder, CO Reg. No. 45066, *pro hac vice*
6 Deputy Solicitor General
7 Shannon Stevenson, CO Reg. No. 35542, *pro hac vice*
8 Solicitor General
9 Elizabeth Orem, CO Reg. No. 58309, *pro hac vice*
10 Assistant Attorney General
11 Colorado Department of Law
12 Ralph L. Carr Judicial Center
13 Consumer Protection Section
14 1300 Broadway, 7th Floor
15 Denver, CO 80203
16 Phone: (720) 508-6651
17 krista.batchelder@coag.gov
18 Shannon.stevenson@coag.gov
19 Elizabeth.orem@coag.gov

20 *Attorneys for Plaintiff State of Colorado, ex rel.*
21 *Philip J. Weiser, Attorney General*

22 **RUSSELL COLEMAN**
23 Attorney General
24 Commonwealth of Kentucky

25 /s/ Philip Heleringer
26 J. Christian Lewis (KY Bar No. 87109),
27 *Pro hac vice*
28 Philip Heleringer (KY Bar No. 96748),
20 *Pro hac vice*
21 Zachary Richards (KY Bar No. 99209),
22 *Pro hac vice*
23 Daniel I. Keiser (KY Bar No. 100264),
24 *Pro hac vice*
25 Matthew Cocanougher (KY Bar No. 94292),
26 *Pro hac vice*
27 Assistant Attorneys General
28 1024 Capital Center Drive, Suite 200
Frankfort, KY 40601
CHRISTIAN.LEWIS@KY.GOV
PHILIP.HELERINGER@KY.GOV
ZACH.RICHARDS@KY.GOV
DANIEL.KEISER@KY.GOV
MATTHEW.COCANOUGHER@KY.GOV

1 Phone: (502) 696-5300
2 Fax: (502) 564-2698
3 *Attorneys for Plaintiff the Commonwealth of Kentucky*

4 **MATTHEW J. PLATKIN**

5 Attorney General
State of New Jersey

6 */s/ Thomas Huynh*

7 Kashif T. Chand (NJ Bar No. 016752008),
Pro *hac vice*
8 Attorney General

9 Thomas Huynh (NJ Bar No. 200942017),
Pro *hac vice*

10 Assistant Section Chief, Deputy Attorney General
Verna J. Pradaxay (NJ Bar No. 335822021),

11 Pro *hac vice*

12 Mandy K. Wang (NJ Bar No. 373452021),
Pro *hac vice*

13 Deputy Attorneys General

14 New Jersey Office of the Attorney General,
Division of Law

15 124 Halsey Street, 5th Floor
Newark, NJ 07101

16 Tel: (973) 648-2052

17 Kashif.Chand@law.njoag.gov

Thomas.Huynh@law.njoag.gov

Verna.Pradaxay@law.njoag.gov

Mandy.Wang@law.njoag.gov

18 *Attorneys for Plaintiffs New Jersey Attorney General
and the New Jersey Division of Consumer Affairs
Matthew J. Platkin, Attorney General for the State of
New Jersey, and Elizabeth Harris, Acting Director of the
New Jersey Division of Consumer Affairs*

1 COVINGTON & BURLING LLP
2

3 By: /s/ Ashley M. Simonsen
4 Ashley M. Simonsen, SBN 275203
5 COVINGTON & BURLING LLP
6 1999 Avenue of the Stars
7 Los Angeles, CA 90067
8 Telephone: (424) 332-4800
9 Facsimile: + 1 (424) 332-4749
10 Email: asimonsen@cov.com

11 Phyllis A. Jones, *pro hac vice*
12 Paul W. Schmidt, *pro hac vice*
13 COVINGTON & BURLING LLP
14 One City Center
15 850 Tenth Street, NW
16 Washington, DC 20001-4956
17 Telephone: + 1 (202) 662-6000
18 Facsimile: + 1 (202) 662-6291
19 Email: pajones@cov.com

20 DAVIS POLK & WARDWELL LLP
21

22 By: /s/ James P. Rouhandeh
23 James P. Rouhandeh, *pro hac vice*
24 Antonio J. Perez-Marques, *pro hac vice*
25 Caroline Stern, *pro hac vice*
26 Corey M. Meyer, *pro hac vice*
27 DAVIS POLK & WARDWELL LLP
28 450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
rouhandeh@davispolk.com
antonio.perez@davispolk.com
caroline.stern@davispolk.com
corey.meyer@davispolk.com

29 Attorney for Defendants Meta Platforms, Inc.
30 f/k/a Facebook, Inc.; Facebook Holdings,
31 LLC; Facebook Operations, LLC; Facebook
32 Payments, Inc.; Facebook Technologies, LLC;
33 Instagram, LLC; Siculus, Inc.; and Mark Elliot
34 Zuckerberg

1 KING & SPALDING LLP
2

3 By: /s/ Geoffrey M. Drake
4 Geoffrey M. Drake, *pro hac vice*
5 TaCara D. Harris, *pro hac vice*
6 1180 Peachtree Street, NE, Suite 1600
7 Atlanta, GA 30309-3521
Telephone: (404) 572-4600
Facsimile: (404) 572-5100
Email: gdrake@kslaw.com
tharris@kslaw.com

8 David P. Mattern, *pro hac vice*
9 KING & SPALDING LLP
10 1700 Pennsylvania Avenue, NW, Suite 900
11 Washington, DC 20006-4707
Telephone: (202) 737-0500
Facsimile: (202) 626-3737
Email: dmattern@kslaw.com

12
13 Bailey J. Langner (SBN 307753)
14 KING & SPALDING LLP
15 50 California Street, Suite 3300
16 San Francisco, CA 94111
Telephone: (415) 318-1200
Facsimile: (415) 318-1300
Email: blangner@kslaw.com

17
18 *Attorneys for Defendants TikTok Inc., ByteDance Inc.,*
TikTok Ltd., ByteDance Ltd., and TikTok LLC

19
20 MUNGER, TOLLES & OLSON LLP
21 By: /s/ Jonathan H. Blavin
22 Jonathan H. Blavin, SBN 230269
23 MUNGER, TOLLES & OLSON LLP
24 560 Mission Street, 27th Floor
25 San Francisco, CA 94105-3089
Telephone: (415) 512-4000
Facsimile: (415) 512-4077
Email: jonathan.blavin@mto.com

26 Rose L. Ehler (SBN 29652)
27 Victoria A. Degtyareva (SBN 284199)
Laura M. Lopez, (SBN 313450)
Ariel T. Teshuva (SBN 324238)

1 MUNGER, TOLLES & OLSON LLP
2 350 South Grand Avenue, 50th Floor
3 Los Angeles, CA 90071-3426
4 Telephone: (213) 683-9100
5 Facsimile: (213) 687-3702
6 Email: rose.ehler@mto.com
7 Email: victoria.degyareva@mto.com
8 Email: Ariel.Teshuva@mto.com

9 Lauren A. Bell (*pro hac vice forthcoming*)
10 MUNGER, TOLLES & OLSON LLP
11 601 Massachusetts Ave., NW St.,
12 Suite 500 E
13 Washington, D.C. 20001-5369
14 Telephone: (202) 220-1100
15 Facsimile: (202) 220-2300
16 Email: lauren.bell@mto.com

17 *Attorneys for Defendant Snap Inc.*

18 WILSON SONSINI GOODRICH & ROSATI
19 Professional Corporation
20 By: /s/ Brian M. Willen
21 Brian M. Willen (*pro hac vice*)
22 WILSON SONSINI GOODRICH & ROSATI
23 1301 Avenue of the Americas, 40th Floor
24 New York, New York 10019
25 Telephone: (212) 999-5800
26 Facsimile: (212) 999-5899
27 Email: bwillen@wsgr.com

28 Lauren Gallo White (SBN 309075)
19 Samantha A. Machock (SBN 298852)
20 WILSON SONSINI GOODRICH & ROSATI
21 One Market Plaza, Spear Tower, Suite 3300
22 San Francisco, CA 94105
23 Telephone: (415) 947-2000
24 Facsimile: (415) 947-2099
25 Email: lwhite@wsgr.com
26 Email: smachock@wsgr.com

27 Christopher Chiou (SBN 233587)
28 Matthew K. Donohue (SBN 302144)
19 WILSON SONSINI GOODRICH & ROSATI
20 953 East Third Street, Suite 100
21 Los Angeles, CA 90013

1 Telephone: (323) 210-2900
2 Facsimile: (866) 974-7329
3 Email: cchiou@wsgr.com
4 Email: mdonohue@wsgr.com

5 *Attorneys for Defendants YouTube, LLC and Google*
6 *LLC*

7 WILLIAMS & CONNOLLY LLP
8 By: */s/ Joseph G. Petrosinelli*
9 Joseph G. Petrosinelli (*pro hac vice*)
jpetrosinelli@wc.com
10 Ashley W. Hardin (*pro hac vice*)
ahardin@wc.com
11 680 Maine Avenue, SW
Washington, DC 20024
Telephone.: 202-434-5000
Fax: 202-434-5029

12 *Attorneys for Defendants YouTube, LLC and Google*
13 *LLC*

14 MORGAN, LEWIS & BOCKIUS LLP
15 By: */s/ Yardena R. Zwang-Weissman*
16 Yardena R. Zwang-Weissman (SBN 247111)
300 South Grand Avenue, 22nd Floor
17 Los Angeles, CA 90071-3132
Tel.: 213.612.7238
18 Email: yardena.zwang-weissman@morganlewis.com

19 Brian Ercole (*pro hac vice*)
600 Brickell Avenue, Suite 1600
20 Miami, FL 33131-3075
Tel.: 305.415.3416
21 Email: brian.ercole@morganlewis.com

22 Stephanie Schuster (*pro hac vice*)
1111 Pennsylvania Avenue NW
23 NW Washington, DC 20004-2541
Tel.: 202.373.6595
24 Email: stephanie.schuster@morganlewis.com

25 *Attorneys for Defendants YouTube, LLC and Google*
26 *LLC*

ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: September 12, 2025

By: /s/ Ashley M. Simonsen